

April 18, 2022

Federal Aviation Administration
Office of Rulemaking
Room 810
800 Independence Avenue, SW
Washington, DC 20591

To whom it may concern,

My name is Jack Miars, and I am currently pursuing my private pilot's license. I applied for a medical certification on August 25th, 2021, and was deferred due to my Attention Deficit Hyperactive Disorder (ADHD) diagnosis and Adderall prescription on September 13th, 2021. My prescribing doctor wrote a positive prognosis letter on October 4th, 2021, and finally I was denied a medical certificate on November 1st, 2021.

To say I was devastated would be an understatement. Aviation is a passion of mine and I was stunned to learn that the use of a prescribed, performance-enhancing medication would restrict me from pursuing this passion, private or commercially. All I really want to do is fly.

I want to provide some background on myself and my diagnosis to you. I am from Dallas, Texas and attended the University of Oklahoma where I received a degree in Architectural Engineering. After moving back to Dallas and beginning a job at a structural engineering firm, I realized that 10-hour days full of engineering calculations exceeded the limits of my attention span. For the first year, I struggled daily and had a lot of shame to seek help. However, in January 2019, I consulted my general physician about suggestions to overcome this.

My doctor provided a self-reporting test in which he determined a minor case of ADHD and subsequently began prescribing 20 milligram tablets of Adderall twice a day. He suggested to see a psychiatrist to confirm the diagnosis and prescription recommendation, which I did shortly after. Ever since then, I have been on the same prescription and it has positively changed my life.

The letter from the FAA dated, September 13th, 2021, requests a letter from the treating psychiatrist that includes information about my Adderall history including usage, frequency of use, diagnosis and prognosis. As stated above, my doctor presented all of this information and more with only positive things to say. I was assured from him that he had done this exercise with patients plenty of times before and I had nothing to worry about. After reading the letter myself, I was quite confident that the letter would be exactly what the medical examiners would need to see to grant approval for the certificate.

The letter from the FAA dated November 1st, 2021, included two different forms of correspondence, a denial and an option to withdraw use of the medication and undergo an intensive, thorough neurological exam over a 90-day period at my own expense. As you know, this includes everything from high school transcripts to arrest history. At best, this could be described as excessive and at worst could be labeled as discrimination.

I do see a need for this process and have great respect for it. However, it seems in the current times that certain policies could be outdated and warrant another look. The stigma of mental health is changing and I do not see why the FAA wouldn't try to be accommodating to as many citizens as possible.

As it stands right now, the policy incentivizes pilots to either not report the medications they are taking or not take medications that are critical to their health. Both of these options are inherently dangerous, especially in comparison to the almost minuscule dangers of pilots taking medications as prescribed.

Recently, I have spent countless hours attempting to research the reasons why the FAA has continued their prohibition of certain medications in this modern age. Per the FAA website, Adderall "may result in cognitive defects that would make an airman unsafe." As a patient, I can tell you this would only be true if I wasn't taking the medication. Furthermore, I have noticed that there are only benefits to my flying ability when using my medication as prescribed. I can come to no other conclusion other than the policy needs to be reexamined and ultimately, changed.

I feel that there is a great opportunity to pioneer tremendous change within the FAA and how it treats potential pilots with minor mental health obstacles. Especially those that have made the effort to seek help and fulfill the needed treatment.

I would love to know the opinions of the Office of Rulemaking on ADHD medications like Adderall and the use of it within the industry. What is the experience with these types of medications? Does it see pilots withholding disclosure or making errors due to not taking it when it's needed? Is this something that should or could be changed?

I look forward to hearing back and hopefully working with you to forge real change. Feel free to contact me using any method below to speed up correspondence.

Sincerely,

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